

## **MEMORANDUM**

To: Brokers, Agents and Navigators Advisory Committee

From: Connecticut Health Insurance Exchange Staff

Re: Role of Navigators, Brokers and Agents

Date: June 8, 2012

---

### **Introduction**

As Connecticut continues to implement a state-based Health Insurance Exchange, establishing a vibrant and effective consumer assistance program will be a critical component to ensure both its short and long term success. Attracting, educating and enrolling individuals across the state's diverse and varied communities will be essential in order to positively impact the health and wellness of the state's residents, garner broad participation from insurers, and ensure the financial viability of the Exchange.

Brokers, agents, and the newly created role of Navigators, will play key roles in executing the outreach and assistance efforts required for the Exchange. Connecticut is currently working on developing the policies, guidelines and infrastructure required for this program. As this effort gets underway, there are several issues and questions which will need to be addressed in order to ensure the program operates optimally for the state and its residents.

This document serves as an overview of the current issues and questions being investigated as the Exchange and its partners explore Navigator and agent/broker options. This document will also serve as a discussion guide for the "Brokers, Agents and Navigators Advisory Committee."

With many other states undertaking a similar effort, our goal is to review program options being looked at elsewhere in the country, gather input and feedback from partners across the state, and utilize these findings to compose a draft set of recommendations for Connecticut's Exchange.

### **Areas of broker, agent and Navigator exploration**

- I. Roles
- II. Training/Certification
- III. Recruitment
- IV. Funding
- V. Materials & Outreach
- VI. Monitoring & Reporting
- VII. SHOP Considerations

## **I. Roles**

The ACA directs that the Exchange must establish a program under which grants are awarded to Navigators, entities or individuals, who will perform the following duties:

### ***Education***

1. Raise the public's awareness of the expanded health insurance options available through the Exchange (and Medicaid);
2. Distribute fair and impartial information concerning enrollment in QHPs, the availability of premium tax credits and cost-sharing reductions in accordance with federal tax laws;
3. Provide information in a manner that is culturally and linguistically appropriate to the needs of the population being served by the Exchange (and Medicaid);

### ***Enrollment***

4. Facilitate enrollment in Qualified Health Plans (or Medicaid); and

### ***Follow-Up***

5. Provide referrals to any appropriate state agency or agencies, for any enrollee with a grievance, complaint, or question regarding their health plan, coverage, or a determination under such plan or coverage.

Given these responsibilities, how should the Exchange position its Navigators? The task of informing and educating individuals about the Exchange and the plans available is substantially different than that of actually facilitating enrollment in a QHP. These tasks may require different skills sets, levels of knowledge and expertise, from public speaking abilities to familiarity with web based applications and financial information. Ensuring Navigators have a robust knowledge of both of these functions will need to be balanced with the need for expertise in particular areas. As we look find the right combination, several questions arise with respect to the implications of these “educator” and “enrollment facilitator” functions:

1. Should Navigators be required to be able to perform both functions, or can Navigators be allowed to pick one role to focus on?
  - What is the optimal ratio of educators to enrollment assisters?
  - Where do we separate education from enrollment? How far into the process does education stop and enrollment begin?
2. While the primary responsibilities will be education and enrollment, how should the Exchange expect Navigators to perform their follow-up activities?
  - Is it reasonable for the Exchange to encourage—or require—that Navigators maintain an ongoing relationship with the individuals or families they assist?

3. Given that many individuals and families in the targeted populations will be eligible for Medicaid and/or CHIP, what type of coordination with respect to the Navigator functions should there be between the Exchange and the state's Medicaid agency?
  - And related, what about other social service programs? Should Navigators be encouraged—while fulfilling their functions related to the Exchange—to provide additional information and enrollment assistance across all public assistance programs? If so, will Navigators need education and training across a wider range of public assistance programs?
  - Will either the absence or presence of a single eligibility determination tool for all state programs affect this recommendation?
4. Many organizations who may be well suited to become Navigators currently assist individuals to enroll in Medicaid or CHIP. For the most part, these entities assist in the education or eligibility determination for a social service that imposes a minimal (if any) financial liability on the enrollee. With respect to the Exchange's operation, individuals and families seeking assistance may request from these community organizations greater assistance in the selection of a specific insurance plan that could potentially have financial implications. In fulfilling the responsibility to assist individuals and families, what level of financial acumen or responsibility should Navigators have when making recommendations?
  - Should Navigators offer explanations with respect to the significance of the metal tiers?—e.g. explain potential differences in premiums and out-of-pocket costs.
  - Should Navigators make explicit recommendations for purchasing QHPs within a specific metal tier?
  - Should Navigators assist with the gathering of additional information on specific QHPs?—e.g. help individuals and families compare network coverage or the prescription drug formulary between plans.
  - Should Navigators follow-up with those whom they assist?— e.g. proactively ask individuals and families if their income status has changed (precipitating a potential adjustment to their advanced premium tax credit).
5. What type of coordination and communication should there be between Navigators and brokers/agents?
  - At what point does the Navigators role end and the brokers/agents role begin?

- Should the Exchange provide to its Navigators a referral list of qualified brokers and agents to whom they can direct clients? Should the Exchange provide brokers and agents with a referral list of Navigators?
  - Should there be an established database to facilitate these transfers?
6. From a marketing and communication perspective, is the term “Navigator” the most appropriate label to use when describing this role to consumers and Exchange participants? Is there a better term which would resonate more with consumers, and more clearly describe this function?

## II. Training/Certification

The ACA states that the “Secretary shall establish standards for Navigators ... including provisions to ensure [that a Navigator] is licensed if appropriate.” Under the final rules pertaining to Navigators, the states retain significant flexibility in the training and certification of Navigators. While the Secretary of HHS will be looking for a certain level of competency in Navigators, it is anticipated that HHS will rely on the Exchange to assure that competency.

The roles that the Exchanges assigns to the Navigators will, in large part, dictate the training and certification process deployed for its Navigator program; as well as any educational and continuing education requirements that the Exchange thinks are appropriate.

1. Should different training modules be designed for the different roles?
  - And if so, should all Navigators be required to: a) complete all training modules so that there is continuity between the roles; and/or b) be capable of performing both duties?
2. How will training completion be logged and tracked?
  - What (if anything) will be issued to ensure that consumers know that someone is in fact trained and certified?
3. Should the Exchange actively encourage or require those who currently provide “general education” and do not directly assist individuals and families enroll into the Exchange and/or Medicaid/CHIP to undertake the Navigator training?
4. Should brokers and agents selling in the Exchange be required to complete the same training modules required of Navigators?
  - Could a separate online broker/agent training module suffice?
5. Do brokers and agents selling through the Exchange need to be licensed and certified by a minimum threshold of carriers offering QHPs through the Exchange (e.g. 3 out of 5), or do they need to be licensed and certified by all carriers to participate?
6. Do insurance carriers have any responsibility to ensure Navigator/Exchange education is included as part of their firm’s licensing and certification training process for brokers and agents?

### **III. Recruitment**

The ACA directs that to be eligible to receive a Navigator grant from the Exchange, an entity must demonstrate to the Exchange that it has existing relationships, or could readily establish relationships, with employers and employees, consumers (including uninsured and underinsured consumers), or self-employed individuals likely to be qualified to enroll in a QHP. Navigator grant recipients may include: trade, industry, and professional associations, community and consumer-focused nonprofit groups, chambers of commerce, unions, licensed insurance agents and brokers, and other entities capable of carrying out the required duties, meeting the standards established by the Secretary of HHS and the Exchange, and providing information that is fair, accurate, and impartial.

There are many organizations that may currently perform the duties and responsibilities of a Navigator as they relate to the education of, and enrollment into, public health programs—including, but not limited to, non-profit community organizations, community health centers, hospitals and faith-based institutions.

Mintz & Hoke, the Exchange’s marketing and outreach consultant, is gathering a list of stakeholders. This list will offer a preliminary guide of entities and individuals to contact. However, with over 300 individuals and/or entities already identified, there will unlikely be sufficient funds to fund every potential Navigator grant application.

1. What type of evaluation criteria do we need to establish in order to determine that an individual or organization has “existing relationships, or could establish existing relationships, with employers and employees, consumers (including uninsured and underinsured consumers) or self employed individuals likely or be qualified to enroll in a qualified health plan.”
2. Should the Exchange allow individuals to apply for a Navigator grant? Or should only organizations be allowed to apply?
3. Do individuals or entities need to receive funding in order to be labeled and operate as Navigators, or will there be “unfunded” or “uncompensated” Navigators?
  - Will all Navigators, whether receiving grant funding or not, need to be trained and certified by the Exchange?
4. Are there current Navigator-like programs for other state subsidy programs?
5. Should the Exchange consider partnering with community health centers or hospitals?
  - What type of incentives or value proposition would entice these groups?

6. How can the Exchange recruit brokers/agents to undergo the Navigator training?
  - What type of incentives or value proposition would entice these groups?
7. Should agents/brokers selling other lines of insurance (i.e., life insurance, long-term disability, auto insurance) be allowed to apply to be Navigators?
  - What types of insurance represents potential conflicts of interest?
  - Should there be a moratorium period on cross-selling or re-contacting consumers for other lines of coverage?
8. Would a re-branding of the word, “Navigator,” help recruit Navigators? (Are there other reasons to rebrand?)
9. Does the Chamber of Commerce or other small business organizations offer education to its members related to health insurance purchasing?
  - Can the Exchange leverage these organizations to serve as Navigators?

### **III. Funding**

As part of the Navigator program development, grants will be made available and distributed to individuals and organizations to allow them to effectively execute a robust outreach and enrollment program. However, the source of funding for these grants remains an area of uncertainty.

The ACA states that Exchanges may not use Federal establishment funding received to create and launch the Exchange as a source for Navigator grants. Instead, Navigator grant funding must come from the Exchanges operational budget or alternate sources. This presents an interesting dilemma, as the Exchange will not generate operating income until after it begins enrolling individuals. Given that Navigators will play a key role in this initial enrollment push, funding for Navigator grants will need to come from other sources.

1. What will the source of short and long term funding be?
  - Will the Navigator program rely solely on funding from the Exchange operating budget, or will Navigator funding also be provided by other agencies or interested parties?
2. Will grant money be distributed to individuals, entities, or combinations of both?
3. What evaluation criteria will be used to determine which entities/individuals receive grant funding?
  - Do we need to require an outreach plan in advance of funding being given?
  - Do we need to review the organization/individuals operating budget to determine financial health?
  - What is the maximum percentage, if any, of an entity's operating budget that may be financed by a Navigator grant?
  - Should we have different evaluation criteria for different types of individuals and entities (urban vs. rural, groups vs. individual, national organizations vs. local, etc)?
4. When issuing funding, what (if any) stipulations do we need to establish regarding how the money is spent?
  - How/when can it be used in areas such as hiring, collateral production, travel, etc, and in what proportion?



- Should funding be used to pay “per-enrollment” incentives to Navigators?
  - What portion can be spent at a time, can it all be deployed initially, do they need to spend it by certain dates, etc?
  - Should the grant dollars be issued yearly, quarterly, monthly?
5. For agents and broker enrolling individuals through the Exchange, should the Exchange set commissions for brokers/agents?
- Who should pay the commission on enrolled individuals, the Exchange directly, or the carriers?

#### **IV. Materials/ Outreach**

In order to effectively engage and communicate with individuals, both brokers/agents and Navigators will need access to clearly written, concise marketing and educational materials that convey consistent information about the Exchange, its role, and how consumers interact with it. As we contemplate the design and use of these materials, we will need to explore the following questions:

1. How much customization should be made available to brokers/agents and Navigators with regard to marketing and educational material?
  - Should we provide a single set of source materials that can be downloaded and utilized (unaltered) by agents, brokers and Navigators?
  - Should Exchange logos and copy be made available, so individuals and organizations can place it in their existing materials?
  - Should organizations be allowed to produce their own material and if so what type of review process by the Exchange would be required?
  - Who owns the responsibility for translation and translation services?
2. What type of material tracking mechanism do we need in place to ensure appropriate use, as well as ensure appropriate level of funding is spent on their creation and distribution?
3. Outside of printed materials, what other types of collateral would be helpful?
  - For example, is there value in producing a static video presentation which can be shown?

## **V. Monitoring/ Reporting**

Effective monitoring of the Navigator program and brokers and agents will provide the Exchange with the ability to improve program performance by enhancing and increasing aspects of the effort that are working well in the community, while altering or eliminating efforts that are not as fruitful. Monitoring and reporting will also be necessary to ensure Navigators and agents/brokers are providing services according to the guidelines and requirements established by the Exchange. Gathering and disseminating appropriate data on performance will be essential to make this happen. As we think about what process and metrics will need to focus on as we launch the Navigator program, in particular, we will be looking for insight in the following areas:

1. What measurements and metrics should we examine and profile to determine success as the Navigator program launches?
  - Number of appointments, meetings, calls, etc, that Navigators have?
  - Number of enrolled members?
  - How do we distinguish between quality and quantity of activity?
  - Should reports/data be made available to all Navigators?
  - Should regular Navigator program participant calls be scheduled to review data and discuss best practices?
  - Should performance metrics be used in making Navigator funding decisions in future years?
2. What type of systems do we need to put in place to gather information to monitor the program's participants?
  - Should the Exchange establish a centralized activity database?
  - Should the Exchange produce tick-sheets, or paper tracking programs?
  - Should participation in reporting process be required as part of program participation?
  - How frequently should the data be collected?
  - What (if any) steps are taken if data is not received?

## **SHOP Considerations**

Much of the focus of the Navigator role has been on individual market outreach and enrollment. However, there may be an opportunity for meaningful Navigator involvement in helping small businesses in the community evaluate, understand and enroll in insurance plans via the SHOP Exchange. With that said, we will need to answer the following questions in order to determine the program structure in this area.

1. Do we want Navigators to actively participate in both the individual and small business portion of the Exchange market?
  - Should Navigators specialize in one of these two areas, or be required to be active (or at least knowledgeable) in both from a training and certification standpoint?
2. Do we need separate training and certification efforts for this, or should it be included in one common training program?
3. Will grants be issued separately for individual versus small business outreach?
4. What criteria will be used to evaluate small business outreach effectiveness?